

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	
v.)	
)	No. 1:18-cr-111
JULIAN PAUL ASSANGE,)	
)	
Defendant.)	

MOTION TO UNSEAL

The United States, through undersigned counsel, hereby moves to unseal the docket in the above-captioned case and specific filings therein. Specifically, the government requests that the following documents be unsealed:

- Dkt. No. 6 – Order Granting Motion to Seal
- Dkt. No. 12 – Motion to Seal by the United States
- Dkt. No. 13 – Order Granting Motion to Seal
- Dkt. No. 16 – Notice filed by the United States
- Dkt. No. 17 – Motion to Unseal by the United States
- Dkt. No. 18 – Order Granting Motion to Unseal
- Dkt. No. 20 – Motion to Unseal by the United States

The government requests that the Motion to Seal filed on December 21, 2017 (Dkt. No. 5), remain under seal because it contains nonpublic information about an ongoing criminal investigation. Premature disclosure of the information could jeopardize the investigation. *See In re Knight Publ'g Co.*, 743 F.2d 231, 235 (4th Cir. 1984) (“The trial court has supervisory power over its own records and may, in its discretion, seal documents if the public’s right of access is outweighed by competing interests.”). The government instead will file a version of this Motion to Seal that redacts the sensitive information with the Clerk’s Office for public docketing.

The government also requests that the Redacted Criminal Case Cover Sheet filed on December 21, 2017 (Dkt. No. 4), and the Redacted Criminal Case Cover Sheet filed on March 6, 2018 (Dkt. No. 11), remain under seal because they contain a portion of the defendant's address at the time. *See* Fed. R. Crim. 49.1. The government will file versions of these documents that redact the address with the Clerk's Office for public docketing.

For the foregoing reasons, the government requests that the Court enter the attached order granting this Motion to Unseal.

Respectfully submitted,

G. Zachary Terwilliger
United States Attorney

By: /s/
Thomas W. Traxler
Assistant United States Attorney
United States Attorney's Office
2100 Jamieson Avenue
Alexandria, VA 22314
Telephone (703) 299-3700
Facsimile (703) 299-3980
Thomas.traxler@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of April, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system.

/s/

Thomas W. Traxler
Assistant United States Attorney